

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
IN RE APPLICATION OF	:	
	:	
MAJED AMIR AL-ATTABI,	:	
	:	
For an Order Pursuant to 28 U.S.C. § 1782 to	:	21-MC-207 (VSB) (RWL)
Take Discovery for Use in Foreign Proceedings	:	
Pending in the Republic of Lebanon.	:	
	:	
	:	
-----	X	

DECLARATION OF LINDA C. GOLDSTEIN

LINDA C. GOLDSTEIN hereby declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner with Dechert LLP and counsel to Bank Audi S.A.L (“Bank Audi”).

I submit this declaration under penalty of perjury.

2. I submit this declaration in support of Bank Audi’s objections to the Magistrate Judge’s order entered March 8, 2022.

3. On March 14, 2022, Bank Audi filed an emergency motion to stay the execution of the subpoenas underlying this matter. Petitioner filed its opposition to Bank Audi’s emergency motion to stay on March 22, 2022. The motion has been noticed for April 1, 2022.

4. In support of the emergency motion to stay, Bank Audi filed a Declaration from Chahdan Jebeyli and accompanying exhibits, a true and correct copy of which is attached as **Exhibit A**. This declaration states that Bank Audi would be prepared to withdraw another defense to which the requested discovery is purportedly relevant if Petitioner withdraws the Subpoenas. Bank Audi would have filed a declaration to that effect in the District Court if the Magistrate had permitted briefing on its proposed motion to quash.

5. Petitioner's initial proposed Protective Order, emailed to me by Petitioner's counsel on March 9, 2022, is attached as **Exhibit B**.

6. On March 15, 2022, I sent Petitioner's counsel a markup of Petitioner's proposed Protective Order, which is attached as **Exhibit C**.

7. On March 17, 2022, Petitioner's counsel sent a further markup of the proposed Protective Order, which is attached as **Exhibit D**.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 22nd day of March, 2022 at New York, New York.

A handwritten signature in cursive script, reading "Linda C. Goldstein", followed by a horizontal line.

Linda C. Goldstein